HAFETZ & NECHELES LLP

ATTORNEYS AT LAW

10 EAST 40TH STREET, 48TH FLOOR NEW YORK, N.Y. 10016 TELEPHONE: (212) 997-7400 TELECOPIER. (212) 997-7646

July 27, 2020

VIA ECF

Honorable Nicholas G. Garaufis United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Raniere, et al., 18-cr-204 (NGG) (VMS)

Dear Judge Garaufis:

I am currently counsel of record for defendant Clare Bronfman in the above-captioned case. Ms. Bronfman has retained new counsel to represent her in connection with this matter going forward. The Court granted Ms. Bronfman's motion to substitute attorneys on July 13, 2020, and since that date attorneys Ronald Sullivan and Duncan Levin have filed Notices of Appearance on the docket (Dkt. Nos. 904 and 905). Now that Ms. Bronfman's new counsel have entered appearances in this matter, I respectfully request to be formally relieved as counsel of record for Ms. Bronfman. I have conferred with Ms. Bronfman, as well as Mr. Sullivan, who both consent to my withdrawal. Ms. Bronfman will not be prejudiced by my withdrawal because she is already represented by new counsel of record and I will be available to provide incoming counsel with any information they require.

In accordance with Local Civ. Rule 1.4, this letter requesting leave of this Court to withdraw as counsel of record will be served upon Ms. Bronfman and all parties in this matter. I am not asserting a retaining or charging lien in connection with this matter. I further request that two other attorneys from my firm, Gedalia Stern and Caroline Grosshans, who had filed notices of appearance in this matter, be formally relieved as well.

Respectfully submitted,

/s/

APPLICATION GRANTED.

The Clerk of Court is respectfully DIRECTED to terminate Ms. Cassidy as counsel to Defendant Clare Bronfman.

SO ORDERED.

/s/ Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: July 28, 2020

Kathleen E. Cassidy